

BGK:CSK
F. # 2018R00578

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

– against –

Criminal Docket No. CR-23-139 (DG)

NAZEM AHMAD, et. al.,

Defendants

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The United States of America, by and through BREON PEACE, United States Attorney, for the Eastern District of New York, Claire S. Kedeshian Assistant United States Attorney, of counsel, hereby files the following Bill of Particulars for Forfeiture of specific properties pursuant to Fed R. Crim P. Rule 7(f) .

The above-captioned Indictment seeks forfeiture of property pursuant to 18 U.S.C. § 982(a)(1)(A), 982(b), 21 U.S.C. § 853, and 21 U.S.C. § 853(p) . The United States hereby gives notice that, in addition to the property described in the forfeiture allegations in the above-captioned Indictment, and Appendices A and B attached thereto, the United States seeks forfeiture of all right, title and interest in the following specific properties:

- (a) Any and all funds, including any and all accrued interest, in the amount of approximately Two Million Forty-Six Thousand, Two Hundred and Twenty Nine Dollars and Eleven Cents (\$2,046,229.11), seized from JP Morgan Chase Bank, N.A. in an Account ending in 4780, and entitled “Blk Acc Christie’s Inc. FBO Nazem Said Ahmad, New York-SDGT”, and all proceeds traceable thereto;
- (b) Two pieces of artwork by Dan McCarthy entitled “Snowcone” and “Lemon Gingham,” owned by White Star DMCC, with any and all

certificates of authenticity and provenance, and all proceeds traceable thereto;

- (c) Three paintings and two painted steel sculptures by Alex Brewer (aka “Hense”), owned by White Star DMCC, with any and all certificates of authenticity and provenance, and all proceeds traceable thereto;
- (d) Four sculptures by Mark Whalen, owned by White Star DMCC, with any and all certificates of authenticity and provenance, and all proceeds traceable thereto;
- (e) One 2.4-carat green diamond cushion modified brilliant cut ring, owned by Best Diamond House DMCC, along with its accompanying grading certification, seized from Christie’s, New York, and all proceeds traceable thereto;
- (f) One sculpture by Joankim Ojanen, entitled “I’m Going to Visit with You Every Time I’m Sad (Blue),” with any and all certificates of authenticity and provenance, and all proceeds traceable thereto;
- (g) Approximately nine diamonds owned, held and/or for the benefit of Golden Yellow Diamonds DMCC, seized from the Gemological Institute of America, New York, and all proceeds traceable thereto;
- (h) Approximately six diamonds owned, held and/or for the benefit of Hall of Diamonds CC, seized from the Gemological Institute of America, New York, and all proceeds traceable thereto; and
- (i) Approximately nineteen diamonds owned, held and/or for the benefit of Mega Gems Pty Ltd., seized from the Gemological Institute of America, New York, and all proceeds traceable thereto.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York
August 16, 2023

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/ Claire S. Kedeshian
Claire S. Kedeshian
Assistant United States Attorney
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